

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

Case No. 1:20 Civ. 484

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA WPC
LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON NELSON;
CASEY KIRSCHNER; ALLCORE
DEVELOPMENT LLC; FINBRIT HOLDINGS
LLC; CHESHIRE VENTURES LLC; JOHN
DOES 1-20,

Defendants.

**DEFENDANT CARLETON NELSON'S MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL & MEMORANDUM IN SUPPORT THEREOF**

In accordance with the Protective Order in this case, Dkt. 55, Defendant Carleton Nelson respectfully seeks leave to file under seal portions of the memorandum of law in support of his Motions To Stay Deadlines for Responding to Plaintiffs' Corrected First Amended Complaint and To Expedite Briefing, as well as the entirety of Exhibit B and portions of Exhibits A, C, D, E, F, and G to the Declaration of Eric R. Nitz dated September 1, 2020. Those filings constitute or reference documents that Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (collectively, "Amazon") have designated as "Confidential" under the Protective Order, Dkt. 55.

Mr. Nelson disagrees with Amazon's designation of the documents at issue as "Confidential," but files this motion to comply with the Protective Order and Local Civil Rule 5(C). Under Local Civil Rule 5, Amazon "must file a response to [this] motion complying with [the] requirements" of Local Civil Rule 5(C)(2), (3), and (4), justifying the sealing of the above-referenced materials, and supplying a proposed order.

Dated: September 1, 2020

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. On September 1, 2020, I will further send the document and a notification of such filing (NEF) to the following parties by e-mail:

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